

Remarks

This Application has been carefully reviewed in light of the Final Office Action mailed June 8, 2006 ("Office Action"). Claims 1-7, 9-15, 19-24, and 28-37 are pending in the Application. The Office Action rejects Claims 1-7, 9-15, 19-24, and 28-37. Applicants have amended Claims 1, 14, 28, 34, and 35. Applicants have cancelled Claim 4. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under U.S.C. § 103

The Office Action rejects Claims 1-7, 9, 12-15, 34, and 35 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,370,373 to Gerth et al. ("*Gerth*") in view of U.S. Publication 2005/0059396 to Chuah et al. ("*Chuah*"). The Office Action rejects Claims 10, 11, 19-22, 24, 28-33, 36, and 37 under 35 U.S.C. § 103(a) as being unpatentable over *Gerth* in view of *Chuah* as applied to Claim 1, and further in view of U.S. Patent 6,904,278 to Iyer ("*Iyer*"). Applicants respectfully traverse these rejections.

Independent Claim 1, as amended, is allowable at least because *Gerth* fails to disclose, expressly or inherently, "a conflict resolution engine for resolving conflicting access point associations, the conflicting access point associations being two or more concurrent associations of the same mobile unit with respective two or more access points." The Office Action alleges that a previous version of this limitation is met by a system for detecting cloning fraud in a cellular mobile telephone environment in *Gerth*. See Office Action, Page 4. Whether or not that is correct, *Gerth* does not disclose "two or more concurrent associations of the same mobile unit with respective two or more access points." *Gerth* discloses determining that a mobile user's mobile identification number has been used to make two separate phone calls, one from the real mobile phone and the other from a clone mobile phone, but this is not resolving a conflict between two or more concurrent associations of the same mobile unit with respective two or more access points. See *Gerth*, Col. 5, Lines 45-67. For instance, *Gerth* discloses a system for comparing the difference in time between two calls that do not overlap. See *Gerth*, Col. 5, Lines 64-67. Since *Gerth* expressly discloses a difference in time between calls that do not overlap, it cannot disclose, expressly or inherently, two or more concurrent associations of the same mobile unit with respective two or more access points.

Additionally, *Gerth* expressly discloses the use of two mobile units, both using the same mobile identification number. *See* Gerth, Col. 5, Lines 50-55. The limitation of Independent Claim 1, however, expressly discloses “the same mobile unit.” Therefore, *Gerth* fails to disclose, expressly or inherently, the limitation of Independent Claim 1. For at least this reason, Independent Claim 1, as amended, is allowable, as are Claims 2-3, 5-7, and 9-13 that depend therefrom. For analogous reasons, Independent Claims 14, 34, and 35, as amended, are allowable, as is Claim 15 that depends therefrom. Reconsideration and favorable action is requested.

Independent Claim 19 is allowable at least because *Iyer* fails to disclose, expressly or inherently, “providing a visualization of current associations between the access points and corresponding associated wireless devices.” The Office Action alleges that this limitation is met by *Iyer*. *See* Office Action, Page 6. This is incorrect. Running a graphical report, referred to as a “Tear Down Report” by *Iyer*, of torn down calls—associations that are no longer current—with whatever frequency is desired, as is disclosed by *Iyer*, is not the same as providing a visualization of current associations, as is claimed. *See* Iyer, Col. 16, Lines 23-48, Col. 5, Lines 35-37. Therefore, *Iyer* clearly fails to disclose, expressly or inherently, “providing a visualization of current associations between the access points and corresponding wireless devices.” For at least this reason, Independent Claim 19 is allowable, as are Claims 20-24 that depend therefrom. For analogous reasons, Independent Claims 36, 37, and 28, as amended, are allowable, as are Claims 29-33 that depend therefrom. Reconsideration and favorable action is requested.

CONCLUSION

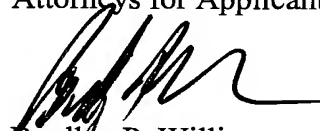
Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other apparent reasons, Applicant respectfully requests allowance of all pending claims.

If the Examiner feels that prosecution of the present Application may be advanced in any way by a telephone conference, the Examiner is invited to contact the undersigned attorney at 214-953-6447.

Applicant believes no fee is due. However, the Commissioner is hereby authorized to charge any additional fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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